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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

LAS VEGAS REGIONAL SURGERY  
CENTER, L.P., a Nevada limited partnership,

Plaintiff,

vs.

BLUE CROSS OF COLORADO, a business  
organization, form unknown, and DOES 1–10,

Defendants.

2:18-CV-00093-RFB-(NJK)

*Stipulation and Order to Extend Time to File  
Response to Defendant's Motion to Dismiss  
Plaintiff's First Amended Complaint Pursuant  
to F.R.C.P. Rule 12(b)(6) and the Reply in  
Support*

(First Request)

In accordance with LR IA 6-1, LR 7-1(a), and 7-2, the parties stipulate as follows:

1. On October 9, 2018, Rocky Mountain Hospital and Medical Service, Inc. doing business as Anthem Blue Cross and Blue Shield, erroneously named as Blue Cross of Colorado, filed Defendant's Notice of Motion and Motion to Dismiss Plaintiff's First Amended Complaint Pursuant to F.R.C.P. Rule 12(b)(6) and 12(e) (ECF No. 32). In accordance with LR 7-2(b), the plaintiff, Las Vegas Regional Surgery Center, L.P., has up to and including October 23, 2018, to file a response to the motion. And Blue Cross would then have until October 30, 2018, to file a reply in support of the motion to dismiss.

1           2.       Because counsel for Las Vegas Regional Surgery Center has been and  
2 will be traveling, he asked for an extension of time until November 6, 2018, to file a  
3 response to the motion. Blue Cross agreed to the extension.

4           3.       But because Blue Cross's counsel will be out of the office on November  
5 13 (the new deadline for it to file a reply) she asked for an extension of time until  
6 November 15, 2018, to file the reply. Las Vegas Regional Surgery Center agreed to  
7 the extension.

8           4.       The parties have agreed to these extensions for good cause and not  
9 solely for the purpose of delay.

10          5.       This is the first request for an extension of time to file an opposition to  
11 the motion to dismiss.

1           6.       Hence the parties stipulate that Las Vegas Regional Surgery Center  
2 shall have up to and including November 6, 2018, to file a response to the motion.  
3 And Blue Cross may file a reply in support of the motion on or before November 15,  
4 2018.

5           DATED this 22nd day of October 2018.

6           DAVID J. MERRILL, P.C.

MESERVE MUMPER & HUGHES LLP

7  
8       By: /s/ David J. Merrill  
9       DAVID J. MERRILL  
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By: /s/ Anna Maria Martin  
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Attorneys for Defendant

15                           IT IS SO ORDERED:

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17                           \_\_\_\_\_  
18                           RICHARD F. BOULWARE, II  
19                           United States District Court  
20                           DATED: October 23, 2018.  
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